

REMARKS

Claims 1 - 11 are pending in the present application. Claim 12 is canceled.

In section 6 of the Office Action, claims 1 – 5, 7, 8 and 11 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,606,627 to Kuo (hereinafter "the Kuo patent"). Claims 1 and 11 are independent. Applicant is clarifying an aspect of claims 1 and 11 that is not disclosed by the Kuo patent.

Claim 1 provides for a method. The method includes, *inter alia*, (a) recording, in association with taking a first image recording with a camera, first data indicative of a geographic location of the camera, (b) recording, in response to an activation of the camera, second data indicative of a geographic location of the camera, and (c) retrieving, from a resource separate from the camera, a second image recording concerning the geographic location indicated by the second data, wherein the second image recording was taken by a device other than the camera. Note that, the second data that is indicative of a geographic location of the camera is recorded in response to an activation of the camera, but the second image recording was taken by a device other than the camera.

The Kuo patent is directed toward a technique for extracting digital elevation data from a pair of stereo images (Abstract). The pair of aerial images includes (a) a left image taken from a first camera station, and space coordinates of the first camera station, and (b) a right image taken from a second camera station, and space coordinates of the second camera station (see FIG. 1B, items 22 and 24, and col. 7, lines 20 – 48). The Kuo patent does not appear to describe whether the left and right images, and the corresponding space coordinates, were taken by a single camera or by two different cameras.

If the left image and right images, and the corresponding space coordinates, are taken by a single camera, then the Kuo patent does not disclose that a second image recording was taken by a device other than the camera, as recited in claim 1.

If (i) the left image and space coordinates of the first camera station are taken by a first camera, and (ii) the right image and the space coordinates of the second camera station are taken by a second camera, then the Kuo et al. patent does not disclose recording, in response to an activation of the

camera, and separately from taking an image recording using said camera, second data indicative of a geographic location of **the camera**, as recited in claim 1.

Thus, the Kuo patent does not anticipate claim 1.

Claims 2 – 5, 7 and 8 depend from claim 1. By virtue of this dependency, claims 2 – 5, 7 and 8 are also novel over the Kuo patent.

Claim 11 is directed toward a method that includes, *inter alia*, (a) recording a first image using a camera, (b) recording, in response to an activation of the camera, but separately from taking an image recording using the camera, data indicative of a geographic location of the camera, and (c) retrieving, based on the data, from a resource other than the camera, a second image concerning the geographic location, wherein the second image recording was taken by a device other than the camera.

Claim 11 includes recitals similar to those of claim 1, as described above. Thus, claim 11, for reasoning similar to that provided in support of claim 1, is also novel over the Kuo patent.

Applicants respectfully request reconsideration and withdrawal of the section 102(b) rejection of claims 1 – 5, 7, 8 and 11.

In section 8 of the Office Action, claim 6 is rejected under 35 U.S.C. 103(a) as being unpatentable over the Kuo patent in view of U.S. Patent No. 5,806,072 to Kuba et al. (hereinafter "the Kuba et al. patent"). Claim 6 depends from claim 1. Applicants respectfully submit that the Kuba et al. patent does not make up for the deficiency of the Kuo patent, as the Kuo patent relates to claim 1. As such, Applicants also submit that claim 1, and claim 6 by virtue of its dependence on claim 1, are both patentable over the cited combination of the Kuo and Kuba et al. patents.

Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claim 6.

In section 9 of the Office Action, claims 9 and 10 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Kuo patent in view of U.S. Patent No. 6,272,235 to Bacus et al. (hereinafter "the

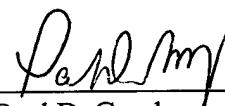
Bacus et al. patent"). Claims 9 and 10 depend from claim 1. Applicants respectfully submit that the Bacus et al. patent does not make up for the deficiency of the Kuo patent, as the Kuo patent relates to claim 1. As such, Applicants also submit that claim 1, and claims 9 and 10 by virtue of their dependence on claim 1, are all patentable over the cited combination of the Kuo and Bacus et al. patents.

Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 9 and 10.

As mentioned above, Applicant is amending claims 1 and 11 to clarify an aspect of claims 1 and 11 that is not disclosed by the Kuo patent. Applicants are also amending claim 1 to delete recitals that do not appear to be necessary for patentability. Applicants are amending claim 6 and 8 for consistency with the amendment to claim 1. None of the amendments is intended to narrow the scope of any term of any claim. Therefore, the doctrine of equivalents should be available for all of the terms of all of the claims.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Respectfully submitted,



Paul D. Greeley
Reg. No. 31,019
Attorney for the Applicants
Ohlandt, Greeley, Ruggiero & Perle, L.L.P.
One Landmark Square, 10th Floor
Stamford, CT 06901-2682
Tel: 203-327-4500
Fax: 203-327-6401

3.28.06
Date